

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

	x
	:
In re	Chapter 11
	:
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	Case No. 22-10943 (MEW)
	:
	(Jointly Administered)
Debtors.	:
	x
	:
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	:
	:
Plaintiffs,	Adv. Proc. No. 22-01138 (MEW)
	:
PIERCE ROBERTSON, <i>et al.</i> ,	:
	:
Defendants.	:
	x

**AMENDED MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE***

I, Joseph M. Kaye, hereby request admission *pro hac vice* in the above-captioned adversary proceeding (the “Adversary Proceeding”) to represent defendants Rachel Gold, Sanford Gold, Rahil Sayed, Christopher Ehrentraut, Todd Manganiello, Dan Newsom, William Ayer, Anthony Dorn, Dameco Gates, Marshall Peters, and Edwin Garrison in the Adversary Proceeding. I represent that I am a member in good standing of the bars of the State of North Carolina and the State of Florida and am admitted to practice before the United States District Courts for the Northern, Southern and Middle Districts of Florida and the Eleventh Circuit Court of Appeals. I have submitted the filing fee of \$200.00 with this *pro hac vice* motion for admission.

Dated: September 28, 2022  
Coral Gables, Florida

THE MOSKOWITZ LAW FIRM

  
Joseph M. Kaye, Esq.  
2 Alhambra Plaza, Suite 601  
Coral Gables, FL 33134-5269  
Telephone: (305) 740-1423  
Email: joseph@moskowitz-law.com

*Counsel to Defendants Rachel Gold, Sanford Gold,  
Rahil Sayed, Christopher Ehrentraut, Todd  
Manganiello, Dan Newsom, William Ayer, Anthony  
Dorn, Dameco Gates, Marshall Peters, and Edwin  
Garrison*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

	-----x
In re	: Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	: Case No. 22-10943 (MEW)
Debtors.	: (Jointly Administered)
	-----x
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	: Plaintiffs,
PIERCE ROBERTSON, <i>et al.</i> ,	: Defendants.
	-----x

**ORDER GRANTING ADMISSION TO PRACTICE *PRO HAC VICE***

Upon the motion of Joseph M. Kaye, to be admitted *pro hac vice* to represent defendants Rachel Gold, Sanford Gold, Rahil Sayed, Christopher Ehrentraut, Todd Manganiello, Dan Newsom, William Ayer, Anthony Dorn, Dameco Gates, Marshall Peters, and Edwin Garrison in the above-captioned adversary proceeding (the “Adversary Proceeding”), and upon the movant’s certification that the movant is a member in good standing of the bars of the State of North Carolina and the State of Florida, it is hereby:

**ORDERED** that Joseph M. Kaye is admitted to practice *pro hac vice* to represent defendants Rachel Gold, Sanford Gold, Rahil Sayed, Christopher Ehrentraut, Todd Manganiello, Dan Newsom, William Ayer, Anthony Dorn, Dameco Gates, Marshall Peters, and Edwin Garrison in the Adversary Proceeding pending in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

Dated: September \_\_, 2022  
New York, New York

---

HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE